

# **EXHIBIT A**

STATE OF SOUTH CAROLINA COUNTY OF ORANGEBURG	IN THE COURT OF COMMON PLEAS FIRST JUDICIAL CIRCUIT
MARVIN SHIELDS,  VS.  LOVE'S TRAVEL STOPS & COUNTRY STORES,  DEFENDANT	PLAINTIFF          CASE #2021-CP-38-_____  <b>SUMMONS</b>

TO: THE DEFENDANT ABOVE-NAMED

YOU ARE HEREBY SUMMONED and required to answer the Complaint, herein, a copy of which is hereby served upon you, and to serve a copy of your Answer to this Complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to Answer the Complaint Judgement by Default will be rendered against you for the Relief demanded in the Complaint.

June 24, 2021

**BILL CONNOR LAW FIRM, LLC**

/s William M. Connor, V  
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Attorney for Plaintiff

STATE OF SOUTH CAROLINA COUNTY OF ORANGEBURG	IN THE COURT OF COMMON PLEAS FIRST JUDICIAL CIRCUIT
MARVIN SHIELDS,  VS.  LOVE'S TRAVEL STOPS & COUNTRY STORES,  DEFENDANT	CASE #2021-CP-38-_____  <b>COMPLAINT (JURY TRIAL DEMANDED)</b>

The Plaintiff, above-named, complaining of the Defendant herein, would respectfully show unto the Court:

1. That the Plaintiff is a citizen and resident of the State of South Carolina.
2. That the Defendant owns and operates a Love's Travel Stop fuel station at 3205 Five Chop Road, Orangeburg SC, where the incident took place causing the below described injuries to the Plaintiff and venue is proper.
3. That on December 12, 2020, the Defendant was on notice of an electric current running through metal at the cash register in between the fast-food franchises at the Love's store, Chester's and Subway, and the said metal went to the location customers came up to engage with the cash register.
4. That Plaintiff, an invitee of the Love's Gas Station, walked up to pay at the cash register and was violently shocked by the current running through the said metal causing him to jolt back and sending a current through his body and the body of a patron behind him and the agent at the cash register.
5. That as a result of the said electrocution, Plaintiff was evaluated and treated at a Veterans Administration hospital and had to be admitted in-patient for injuries caused

by the electrocution, and was later treated for injuries to his shoulder and back from when he jerked back due to the shock.

### **NEGLIGENCE**

6. That Plaintiff repeats all previous allegations of this Complaint as if repeated verbatim.
7. That Defendant owed the invitee Plaintiff the duty to prevent any electric current from running through the metal that customers were reasonably expected to touch or otherwise suffer electrocution.
8. That Defendant breached duty by not only allowing the current to continue through the said metal, but not providing a warning to customers of the said hidden danger of electrocution.
9. That the Defendant's said breach of duty was the proximate cause of Plaintiff's said electrocution.
10. That the electrocution caused substantial damages to Plaintiff, including Emergency Department treatment and the in-patient hospitalization and further ongoing treatment.

As the direct and proximate result of the aforesaid negligent and intentional and/or reckless outrageous acts of the Defendant in allowing an electric current to run through metal to where customers would be reasonably certain to sustain electrocution, which Defendant was certain or substantially certain would cause injury to the Plaintiff as set forth above, Plaintiff has suffered severe injuries, present and future, causing shock and mental distress past, present, and future; all resulting in actual and punitive damages in an amount to be determined by the triers of fact.

WHEREFORE, the Plaintiff prays for judgment for actual and punitive damages in an amount to be determined by the triers of fact, plus the costs and disbursements of this action.

June 24, 2021

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